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Judge: Thomas T. Glover
Chapter: 7
Location: Seattle

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

)	Case Number: 10-14343-TTG
INMEDIARES PRODUCTIONS, <i>dba</i>)	
CATALYST GAME LABS,)	DECLARATION OF JAMES A.
)	SANTUCCI IN OBJECTION TO
Debtor.)	REQUEST FOR HEARING ON
)	SHORTENED TIME
)	
)	(Ex Parte)
)	

JAMES A. SANTUCCI, declares as follows:

1. I am counsel for the Debtor InMediaRes Productions, LLC, ("IMR") and base this declaration upon my own personal knowledge and am competent to testify to the matters contained herein.

2. I received a "Motion For Hearing on Shortened Time" this afternoon. This motion does not comply with the requirements of LBR 9013(d)(3) for a motion to shorten time. While it is too late for the creditors to give notice of a motion for this Friday's hearing, the next court scheduled hearing date could be set for June 18, 2010 as is stated in their motion. There is no exigent or exceptional circumstance stated by the Creditor's motion as to why this motion

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needs to be heard in 2 ½ days. The motion is completely devoid of even the hint of any need to have this motion heard now.

2. The motion will be vigorously contested as the Creditors appear to seek an order of relief to which they are not entitled. The Debtor answered within the requisite time as allowed by court rules for 21 days to respond, 3 additional days for service by mail, and when ending on a weekend, the next following court day, being Monday, May 17, 2010.

3. The Debtor objects to the viability of these alleged creditors as proper creditors to an involuntary bankruptcy petition. Their claims are absolutely disputed by the Debtor, as is addressed in the Debtor's Answer filed on May 17, 2010.

4. Additionally, I have been scheduled for several weeks to be in Tacoma at 9:00 a.m. on a real estate matter, covering this matter for Mr. Lanz who will be out of state Thursday and Friday. There is no one left in the office to cover for me at this motion on shortened time.

5. Given that the Creditors have not pleaded any exigent or exceptional need to have essentially, a default motion, to be heard this Friday, and that their motion is incorrect in their request for relief, and that I will be in Tacoma, Friday at 9:00 a.m. on another matter, the Creditor's request for shortened time should be denied.

I CERTIFY OR DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON AND UNITED STATES, THAT THE FOREGOING IS TRUE AND CORRECT.

Dated at Seattle, Washington this 18th day of May, 2010.

THE LANZ FIRM, P.S.:

By: /s/ James A. Santucci
James A. Santucci, WSBA #7393
Attorney for Debtor

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